

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

ANTHONY JUSKOWICH

Criminal No. 2:22-cr-9

INFORMATION MEMORANDUM

AND NOW comes the United States of America, by its attorneys, Cindy K. Chung, United States Attorney for the Western District of Pennsylvania, and Rebecca L. Silinski, Assistant United States Attorney for said District, and submits this Information Memorandum to the Court:

I. THE INFORMATION

A two-count information was filed against the above-named defendant for alleged violations of federal law:

<u>COUNT</u>	<u>OFFENSE/DATE</u>	<u>TITLE/SECTION</u>
One	Conspiracy to Commit Sex Trafficking by Force, Threats of Force, Fraud or Coercion From in and around January 2020 to May 2020	18 U.S.C. § 1594(c)
Two	Attempt to Commit Sex Trafficking by Force, Threats of Force, Fraud or Coercion From on or about May 13, 2020, to May 14, 2020	18 U.S.C. § 1594(a)

II. ELEMENTS OF THE OFFENSES

A. As to Count One:

In order for the crime of Conspiracy to Commit Sex Trafficking by Force, Threats of Force, Fraud or Coercion, in violation of 18 U.S.C. § 1594(c), to be established, the government must prove all of the following essential elements beyond a reasonable doubt:

1. That the defendant conspired with one or more persons to recruit, entice, harbor, transport, provide, obtain or maintain by any means, a person whom the defendant knew would be caused to engage in a commercial sex act, as that term is defined in Title 18, United States Code, Section 1591(e)(3).

2. That the defendant did know or recklessly disregarded the fact that means of force, threats of force, fraud, coercion, or any combination of such means would be used to cause the person to engage in a commercial sex act.

3. The recruiting, enticing, harboring, transporting, providing, obtaining or maintaining was done in or affecting interstate commerce.

B. As to Count Two:

In order for the crime of Attempt to Commit Sex Trafficking by Force, Threats of Force, Fraud or Coercion, in violation of 18 U.S.C. § 1594(a), to be established, the government must prove all of the following essential elements beyond a reasonable doubt:

1. That the defendant attempted to recruit, entice, harbor, transport, provide, obtain or maintain by any means, a person whom the defendant knew would be caused to engage in a commercial sex act, as that term is defined in Title 18, United States Code, Section 1591(e)(3).

2. That the defendant did know or recklessly disregarded the fact that means of force, threats of force, fraud, coercion, or any combination of such means would be used to cause the person to engage in a commercial sex act.

3. The recruiting, enticing, harboring, transporting, providing, obtaining or maintaining was done in or affecting interstate commerce.

III. PENALTIES

As to Count One: Conspiracy to Commit Sex Trafficking by Force, Threats, Fraud or Coercion (18 U.S.C. § 1594(c)):

1. A term of imprisonment of any term of years or for life. (18 U.S.C. § 1594(c)).
2. A fine not to exceed \$250,000.00. (18 U.S.C. § 3571(b)(3)).
3. A term of supervised release of not more than five (5) years. (18 U.S.C. § 3583(b)(1)).
4. Any or all of the above.

As to Count Two: Attempt to Commit Sex Trafficking by Force, Threats, Fraud or Coercion (18 U.S.C. § 1594(a)):

1. A term of imprisonment of not less than fifteen (15) years and up to life. (18 U.S.C. § 1591(b)(1)).
2. A fine not to exceed \$250,000.00. (18 U.S.C. § 3571(b)(3)).
3. A term of supervised release of not more than five (5) years. (18 U.S.C. § 3583(b)(1)).
4. Any or all of the above.

IV. MANDATORY SPECIAL ASSESSMENT

A mandatory special assessment of \$100.00 must be imposed at each count upon which the defendant is convicted, pursuant to 18 U.S.C. § 3013.

With respect to Counts One and Two, an additional special assessment of \$5,000.00 must be imposed at each count upon which the defendant is convicted, as the offenses were committed after May 29, 2015 and the offenses are located within Chapter 77 of Title 18, United States Code. 18 U.S.C. § 3014(a).

V. RESTITUTION

Restitution may be required in this case as to Counts One and Two, together with any authorized penalty, as part of the defendant's sentence pursuant to 18 U.S.C. §§ 1593, 3663, 3663A, and 3664.

VI. FORFEITURE

As set forth in the Information, forfeiture is applicable in this case.

Respectfully submitted,

CINDY K. CHUNG
United States Attorney

/s/ Rebecca L. Silinski
REBECCA L. SILINSKI
Assistant United States Attorney
PA ID No. 320774